

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE INTERCEPT MEDIA, INC., : NO. 1:24-cv-01515-JSR  
Plaintiff, :  
: v.  
: OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC and MICROSOFT  
CORPORATION, X  
Defendants.

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**DECLARATION OF JOSEPH C. GRATZ IN SUPPORT OF MOTION FOR  
ADMISSION PRO HAC VICE**

I, Joseph C. Gratz, declare as follows:

1. I am an attorney at law license to practice in the state of California. I submit this Declaration in support of the motion to admit me *pro hac vice* before the United States district Court for the Southern District of New York to represent Defendants OpenAI, Inc., OpenAI PG, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.

2. I am a member of good standing in the bar of California. A true and correct copy of my certificate of good standing issued by the Supreme Court of California within the past 30 days is attached hereto.

3. Pursuant to Local Rule 1.3(c), I state:  
a. I have never been convicted of a felony;

b. I have never been censured, suspended, disbarred, or denied admission or readmission by any court; and

c. There are no disciplinary proceedings presently against me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21<sup>st</sup> day of March, 2024.



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Joseph C. Gratz